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Attorneys for Defendant
5 JUAN CARLOS MARTINEZ CASTRO

6
7 IN THE UNITED STATES DISTRICT COURT
8 FOR THE EASTERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,) Case No. 2:19-cr-233 TLN
10)
Plaintiff,) STIPULATION AND ORDER TO CONTINUE
11) STATUS CONFERENCE, AND TO EXCLUDE
vs.) TIME
12)
JUAN CARLOS MARTINEZ) Date: February 27, 2020
13 CASTRO,) Time: 9:30 a.m.
Defendant.) Judge: Hon. Troy L. Nunley
14)
_____)

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16 IT IS HEREBY STIPULATED by and between the parties hereto through their
17 respective counsel, U.S. Attorney McGregor Scott, through Assistant United States Attorney
18 Justin Lee, attorney for Plaintiff, and Federal Defender Heather Williams, through Assistant
19 Federal Defender Hannah Labaree, attorney for defendant Juan Carlos Martinez Castro, and
20 Christopher Cosca, attorney for defendant Shannon Jeffries, that the previously-scheduled status
21 conference date of February 27, 2020, be vacated and the matter be set for status conference on
22 April 2, 2020 at 9:30 a.m, at the defendants' request.

23 On January 14, 2020, the government produced 28 pages of paper discovery. Per
24 communication with counsel for the government on February 20, 2020, additional discovery is
25 forthcoming, in the form of photographs, audio recordings, and additional law enforcement
26 reports. Counsel for the defendants will require time to review the new discovery, conduct
27 independent investigation, and meet with their clients to review the material. Defense counsel
28

1 believe that the failure to grant the above-requested continuance would deny them the reasonable
2 time necessary for effective preparation, taking into account the exercise of due diligence.

3 Based upon the foregoing, the parties agree time under the Speedy Trial Act should be
4 excluded from this order's date through and including April 2, 2020, pursuant to 18 U.S.C.
5 §3161 (h)(7)(A) and (B)(iv) (reasonable time to prepare), and General Order 479, Local Code T4,
6 based upon continuity of counsel and defense preparation.

7 Counsel and the defendant also agree that the ends of justice served by the Court granting
8 this continuance outweigh the best interests of the public and the defendant in a speedy trial.

9 Respectfully submitted,

10 Dated: February 25, 2020

HEATHER E. WILLIAMS
Federal Defender

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12 /s/ Hannah Labaree
HANNAH LABAREE
Assistant Federal Defender
Attorney for Defendant
Juan Carlos Martinez Castro

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14
15 Dated: February 25, 2020

/s/ Christopher Cosca
CHRISTOPHER COSCA
Attorney for Defendant
Shannon Jeffries

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19 Dated: February 25, 2020

MCGREGOR SCOTT
United States Attorney

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21 /s/ Justin Lee
JUSTIN LEE
Assistant U.S. Attorney
Attorney for Plaintiff

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